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DYNAMIC LEDGER SOLUTIONS, INC.,

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

## SAN FRANCISCO DIVISION

GGCC, LLC, an Illinois Limited Liability Company, Individually and on behalf of all others similarly situated,

Plaintiff,

V.

DYNAMIC LEDGER SOLUTIONS, INC., a Delaware Corporation, TEZOS STIFTUNG, a Swiss Foundation, KATHLEEN BREITMAN, an individual, and ARTHUR BREITMAN, an individual.

## Defendants.

Case No. 3:17-cv-06779-RS

**JOINT STIPULATION EXTENDING  
TIME FOR DYNAMIC LEDGER  
SOLUTIONS INC., KATHLEEN  
BREITMAN AND ARTHUR  
BREITMAN TO RESPOND TO  
COMPLAINT**

Judge: Hon. Richard Seeborg

1 Defendants Dynamic Ledger Solutions, Inc. (“DLS”), Kathleen and Arthur Breitman (the  
 2 “Breitmans”) and plaintiff GGCC, LLC (“GGCC”) (collectively, the “Appearing Parties”) stipulate  
 3 pursuant to Civil L. R. 6-1(a) to extend the time for DLS and the Breitmans to respond to the putative  
 4 class action complaint filed by GGCC (the “GGCC Complaint”) (Dkt. No. 1) in the above-captioned  
 5 action (the “Instant Action”) as follows:

6 WHEREAS, on November 26, 2017, GGCC filed the GGCC Complaint alleging violations of  
 7 the Securities Act;

8 WHEREAS, Securities Act claims brought as class actions pursuant to the Federal Rules of  
 9 Civil Procedure may be subject to the lead plaintiff provisions of the Private Securities Litigation  
 10 Reform Act (“PSLRA”). *See* 15 U.S.C. § 77z-1;

11 WHEREAS, GGCC is in the process of serving DLS and the Breitmans with the Summons  
 12 and Complaint in the Instant Action;

13 WHEREAS, on December 4, 2017, the Instant Action was deemed related to actions entitled  
 14 *Okusko v. Dynamic Ledger Solutions, Inc., et al.*, 17-cv-06829, and *Baker v. Dynamic Ledger*  
 15 *Solutions, Inc., et al.*, 17-cv-06850, and such actions were assigned to the Hon. Richard Seeborg;

16 WHEREAS, on December 8, 2017, GGCC filed a Notice of Publication of PSLRA Notice,  
 17 which states that GGCC filed a notice in conformity with the lead plaintiff provisions of the PSLRA;

18 WHEREAS, GGCC intends to file a consolidated complaint that will serve as the operative  
 19 complaint if it is appointed lead plaintiff in this matter;

20 WHEREAS, the Appearing Parties have met and conferred and agree that DLS and the  
 21 Breitmans should not have any obligation to respond to any complaint filed in the Instant Action until  
 22 a lead plaintiff has been appointed and a consolidated complaint is filed;

23 WHEREAS, this stipulated extension will not alter the date of any event or any deadline  
 24 already fixed by order of this Court;

25 WHEREAS, there have not been any previous time modifications in this case; and

26 WHEREAS, DLS and the Breitmans agree to waive service of the GGCC Complaint as of the  
 27 date of this Stipulation;

1 NOW, THEREFORE, the Appearing Parties, hereby stipulate as follows:

2 1. DLS and the Breitmans shall not be required to move to dismiss or otherwise respond  
3 to the GGCC Complaint filed in the Instant Action until 30 days after the Court appoints  
4 a lead plaintiff and lead counsel, and lead plaintiff files and serves a consolidated  
5 complaint or a notice stating that lead plaintiff designates a previously filed complaint  
6 as operative. Pursuant to Civil L. R. 6-1(a), this paragraph shall be effective upon the  
7 filing of this Stipulation with the Court.

8 **IT IS SO STIPULATED.**

9 Dated: January 5, 2018

10 **THE RESTIS LAW FIRM, P.C.**

11 **BAKER MARQUART LLP**

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*/s/ William R. Restis*  
14 William R. Restis (246823)

*/s/ Brian E. Klein*  
15 Brian E. Klein (258486)

16 Attorney for Plaintiff GGCC, LLC

17 Attorney for Defendants DYNAMIC LEDGER  
18 SOLUTIONS, INC., KATHLEEN  
19 BREITMAN, and ARTHUR BREITMAN

20 **COOLEY LLP**

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*/s/ Patrick E. Gibbs*  
23 Patrick E. Gibbs (183174)

24 Attorneys for Defendant  
25 DYNAMIC LEDGER SOLUTIONS, INC.,

26  
27  
28  **FILER'S ATTESTATION**

29 Pursuant to Civil Local Rule 5-1(i)(3), regarding signatures, Patrick E. Gibbs hereby attests  
30 that concurrence in the filing of this document has been obtained from all the signatories above.

1 Dated: January 5, 2017

COOLEY LLP

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*/s/ Patrick E. Gibbs*

4 Patrick E. Gibbs

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